

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

D.J.; et. al.

Plaintiffs

v.

UNIVERSITY OF IOWA HOSPITALS
AND CLINICS, an Iowa entity, et al.

Defendants

NO. 2:22-cv-00752-CB

JUDGE CATHY BISSOON

DECLARATION OF DR. KATHERINE SIMS IN SUPPORT OF
DEFENDANT MASSACHUSETTS GENERAL HOSPITAL
AND KATHERINE SIMS, M.D. MOTION TO DISMISS
PLAINTIFFS' CLASS ACTION COMPLAINT

I, Dr. Katherine Sims, hereby state and declare as follows:

1. I am a board-certified physician specializing in pediatric neurology. I am affiliated with a number of hospitals in Boston including the Massachusetts General Hospital. I received my medical degree from Columbia University School of Public Health and have been licensed to practice in Massachusetts for over 20 years.
3. From 2009 to 2013, I was (and remain) a Massachusetts resident and citizen.
4. I have never lived in Pennsylvania.
6. I have never been employed in Pennsylvania.
7. I have never had an office in Pennsylvania.
8. I do not have a bank account in Pennsylvania.
9. I am not licensed to practice medicine in Pennsylvania.
10. I have never treated patients in Pennsylvania.

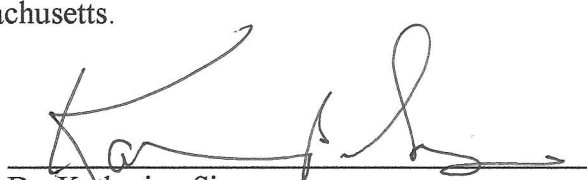


11. I have never treated any of the named plaintiffs in this case.
12. I do not direct advertising or marketing at Pennsylvania.
13. I do not have an authorized agent to receive service of process in Pennsylvania.
14. I do not own or control land in Pennsylvania.
15. I do not have a mailing address or telephone or fax listing in Pennsylvania.
16. Neither of the two Fabrazyme Stakeholders Working Group meetings referenced in the Complaint filed in this action took place in Pennsylvania.

17. I am familiar with the "Guidance to the Fabry Community on the Management of Fabrazyme (asalsidase beta) Supply" filed as Exhibit A to the Complaint in this action and am familiar with the "Revised Guidance to the U.S. Fabry Community: Management of Fabrazyme (agalsidase beta for injection) Supply" filed as Exhibit B to the Complaint in this action.

18. I did not draft either of those two documents. I did not send these two documents to anyone. It was my understanding that these documents were sent by Genzyme to Fabrazyme-prescribing physicians for their consideration. It was not my understanding that these documents would be sent to patients. I did not approve or authorize sending these documents to patients.

19. I declare under penalties of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on this ____th day November ____ 2022, in Massachusetts.



Dr. Katherine Sims